

# Exhibit B

**Franklin, Trevor**

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**From:** Gerard Fox <gfox@gerardfoxlaw.com>  
**Sent:** Wednesday, August 11, 2021 5:25 PM  
**To:** Segal, Jonathan  
**Cc:** Bayard, Samuel; Goldberg, Rachel  
**Subject:** RE: Case 1:20-cv-04691-MKV Goureau et al v. Lemonis et al Letter

Doug Wexler wrote me an email that called for a stay in all cases but the BK court, and I have that email. So, it's not a misrepresentation. If Machete wants to litigate, well, we are filing a full motion for leave to amend with the full complaint and you will get your wish. We are not withdrawing the letter.

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**From:** Segal, Jonathan <JonathanSegal@dwt.com>  
**Sent:** Wednesday, August 11, 2021 2:20 PM  
**To:** Gerard Fox <gfox@gerardfoxlaw.com>  
**Cc:** Bayard, Samuel <SamuelBayard@dwt.com>; Goldberg, Rachel <RachelGoldberg@dwt.com>  
**Subject:** Re: Case 1:20-cv-04691-MKV Goureau et al v. Lemonis et al Letter

" Warning, External Sender"  
Mr. Fox,

I write to give you an opportunity to explain the misrepresentation you made to the court today.

You have never approached me (lead counsel) or any other representative of Machete to request a stay of either case nor have I agreed to one. Had you done so, and had I agreed, we would have worked on a joint stipulation to file with the court or filed one already, or at least emailed about such a discussion. No such record exists because I have not talked with you about a stay.

I demand that you immediately withdraw the letter and disclose your misrepresentation or face sanction under Rule 11.

Regards,

Jon

Sent from my iPhone

On Aug 11, 2021, at 1:22 PM, Dhruv Vyas <[dvyas@gerardfoxlaw.com](mailto:dvyas@gerardfoxlaw.com)> wrote:

Dear Hon. Judge Vyskocil,

Please see attached letter in response to Michael Wexler's letter [Dkt #61], which was filed with the Court moments ago.

Thank you kindly,

**Dhruv Vyas**  
Pro Noun: (Him/His)  
Senior Trial Paralegal

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<image001.png>

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